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GEORGIA-PACIFIC CORRUGATED LLC, a
Delaware limited liability company

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

SALVADOR AGUAYO, JR.,

Plaintiff,

vs.

GEORGIA-PACIFIC CORRUGATED LLC, a
Delaware limited liability company, and Does 1
through 20, inclusive,

Defendants.

Case No. 1:20-cv-00264-NONE-EPG

**STIPULATION AND ORDER TO AMEND
SCHEDULING ORDER**

Plaintiff SALVADOR AGUAYO, JR., (“Plaintiff”) and Defendant GEORGIA-PACIFIC CORRUGATED LLC (“Defendants”) (Plaintiff and Defendant, collectively “Parties”), hereby stipulate and ask the Court to modify the Scheduling Order entered on May 15, 2020 (ECF No. 11) in accordance with the stipulated scheduled set forth herein and in light of the good cause set forth herein.

WHEREAS, the Scheduling Order entered on May 15, 2020 set the following deadlines and conference dates:

Nonexpert Discovery Cutoff: January 29, 2021

Expert Disclosure: March 1, 2021

Rebuttal Expert Disclosure: March 31, 2021

Expert Discovery Cutoff: April 30, 2021

Dispositive Motion Filing Deadline: June 14, 2021

Pretrial Conf.: Date: October 12, 2021

Time: 8:15 a.m.

Dept: 4

WHEREAS, the Parties exchanged their Initial Disclosures in April 2020 and thereafter promptly and diligently began conducting further written discovery;

WHEREAS, in July 2020, the Parties agreed to suspend formal discovery to explore the possibility of early resolution of this matter;

WHEREAS, in September 2020, the Parties agreed to participate in mediation and Defendant agreed to conduct extensive ESI searches and informally produce documents necessary to conduct a productive mediation;

WHEREAS, Defendant diligently conducted the ESI search and review, but due to the volume of the production and necessary redactions to protect proprietary business information, the informal production was not completed until December 7, 2020;

WHEREAS, the Parties have scheduled a mediation with Judge Donald S. Black (Ret.) for March 12, 2021;

WHEREAS, the current discovery deadlines will not provide the Parties sufficient time to conduct additional discovery, should the mediation be unsuccessful;

WHEREAS, the Parties believe that a continuance of all pending dates and deadlines, is in the best interests of the Parties and the Court, as it will conserve all resources and ensure that the Parties are able to effectively mediate this matter in an attempt to achieve a full and complete resolution;

WHEREAS, for these reasons, good cause exists to extend both the non-expert and expert discovery deadlines by 180 days;

WHEREAS, for these same reasons, the Parties believe that all other pretrial dates and deadlines should likewise be extended by at least 180 days to conform the pretrial schedule to the discovery deadlines;

1 NOW THEREFORE, the Parties, by and through their undersigned counsel, do hereby
2 agree and request that the dates and deadlines in the Scheduling Order set forth above be amended
3 as follows:

4 Nonexpert Discovery Cutoff: July 28, 2021

5 Expert Disclosure: August 27, 2021

6 Rebuttal Expert Disclosure: September 27, 2021

7 Expert Discovery Cutoff: October 27, 2021

8 Dispositive Motion Filing Deadline: December 10, 2021

9 Pretrial Conf.: Date: April 12, 2021

10 Time: 8:15 a.m.

11 Dept: 4

12
13 **IT IS SO STIPULATED.**

14
15 DATED: December 29, 2020

BRYANT WHITTEN LLP

16
17 By: /s/ Shelley G. Bryant (with permission)

18 Shelley G. Bryant
19 Amanda B. Whitten
Attorneys for Plaintiff
SALVADOR AGUAYO, JR.

20
21 DATED: December 29, 2021

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.

22
23
24 By: /s/ Jill L. Schubert

James T. Conley
Jill L. Schubert

25 Attorneys for Defendant
26 GEORGIA-PACIFIC CORRUGATED LLC,
27 a Delaware limited liability company
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ORDER

Pursuant to the Stipulation of the parties (ECF No. 19), the Scheduling Order (ECF No. 11) is modified as follows:

Event	Deadline/Date
Nonexpert Discovery Cutoff	July 28, 2021
Expert Disclosure	August 27, 2021
Rebuttal Expert Disclosure	September 27, 2021
Expert Discovery Cutoff	October 27, 2021
Dispositive Motion Filing Deadline	December 10, 2021
Pretrial Conference	April 12, 2022 , 8:15 AM, Courtroom 4 (NONE)

All other terms and conditions of the Scheduling Order (ECF No. 11) remain in full force and effect.

IT IS SO ORDERED.

Dated: **January 3, 2021**

/s/ Eric P. Gray
UNITED STATES MAGISTRATE JUDGE